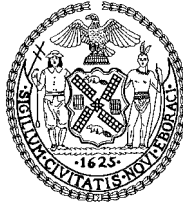


The enlargement request is granted. The initial pretrial conference scheduled for August 30, 2024 is adjourned until December 6, 2024.



SO ORDERED

/s/ Alvin K. Hellerstein
U.S.D.J.

August 7, 2024

Marina Moraru
Special Assistant Corporation Counsel
Office: 212) 356-2456

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

August 6, 2024

VIA ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *L.M. v. New York City Dep't of Educ.*, 24-cv-4289 (AKH)(SN)

Dear Judge Hellerstein:

I am a Special Assistant Corporation Counsel in the office of Acting Corporation Counsel, Muriel Goode-Trufant, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request an extension of Defendant's time to respond to the Complaint, from August 14 to November 25, 2024, i.e. 90-days from the date Plaintiff has agreed to provide the needed billing records (and a privilege log, if redacted for privilege) and retainer agreement/s with redactions for parent and minor's personally identifiable information only (August 27). Defendant also respectfully requests an adjournment of the telephonic status conference currently scheduled for August 30, 2024 for 60 days to October 29, 2024 or to a future date convenient to the Court. Plaintiff consents to these requests.

This is Defendant's first request for an extension of time to respond to the Complaint. Upon receipt of the documents from opposing counsel, the requested extension will give Defendant's counsel time to complete the City's internal review process by reviewing the billing records together with the underlying administrative record, begin settlement negotiations and hopefully resolve this matter without the need for a conference or motion practice. We have resolved recent similar IDEA fees-only cases brought by plaintiffs represented by the Roller firm without the need to burden the court with any sort of motion practice or conferences. The parties are hopeful this matter will be resolved as well.

Accordingly, Defendant respectfully requests (a) that Defendant's time to respond to the complaint be extended to November 25, 2024, (b) an adjournment of the telephonic status conference until October 29, 2024 or to a future date convenient to the Court, and (c) the submission of a joint status letter advising the Court of the status of settlement negotiations by November 25, 2024.

Thank you for considering these requests.

Respectfully submitted,

/s/ Marina Moraru

Marina Moraru, Esq.
Special Assistant Corporation Counsel

cc: Irina Roller (via ECF)